

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA

v.

SANTIAGO ET AL.

**DEFENDANT'S MOTION TO ENLARGE THE TIME TO FILE THE DISCOVERY
LETTERS [ASSENTED]**

Now come the undersigned defendants and move this Honorable Court, pursuant to F.R.A.P. Rule 26 to enlarge the time to file their discovery letters through March 4, 2005. The logistics of filing one letter for all defendants requires some additional time.

The government has assented to this motion. Her time to respond to our letter should be likewise enlarged. All parties agree that this additional time should be excluded, pursuant to the Speedy Trial Act, in the interests of justice.

WHEREFORE, the parties pray that this Court grant the enlargement.

Respectfully submitted,
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By his attorney,

/s/ Lenore Glaser
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For the government,

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Dated: February 18, 2005

Attorney John F. Cicilline for Julio Carrion Santiago; Attorney Carl N. Donaldson for Reynaldo Rivera; Attorney Valerie Carter for Jose Rodriguez; Attorney Robert M. Goldstein for Luis F. Sanchez; Attorney Victoria M. Bonilla-Argudo for Edwin Torrez and Attorney Roger Witkin for Zuleima Reyes were contacted but have not yet responded.

Certificate of Service

Attorney John D. Hodges, Jr. and Attorney Anthony J. Scola who do not have email were notified telephonically and sent a copy by prepaid first class mail on February 18, 2005.